

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:25-CV-21679-GAYLES/AUGUSTIN-BIRCH

CARLOS MANUEL VASQUEZ LOPEZ,

Plaintiff,

vs.

HENRY VERA,

Defendants.

DECLARATION OF INDEBTEDNESS PURSUANT TO 28 U.S.C. §1746

Plaintiff, Carlos Manuel Vasquez Lopez, having been duly sworn, deposes and says as follows pursuant to 28 U.S.C. §1764:

1. I was an employee of Defendant, Henry Vera, at his restaurant, Vera Restaurant Inc. d/b/a 5 Esquinas, and initiated this lawsuit to recover for the wages, minimum wages, and overtime I earned but was not paid.

2. Defendant employed me at his restaurant from approximately May 2024 to November 2024.

3. I earned and so am owed the total amount of **\$6,444.00** in straight time wages, minimum wages, and overtime wages, comprised of the following:

a. I am owed **\$4,544.00** in unpaid straight time wages, calculated below:

Period Start	Period End	Hourly Rate	Hours Worked	Wages Owed
10/7/24	10/20/24	\$16.00	100	\$1,600.00
10/21/24	11/3/24		100	\$1,600.00
11/4/24	11/17/24		84	\$1,344.00

- b. Included in the straight time wages I am owed is **\$2,059.00** in unpaid minimum wages under the FLSA, calculated as follows:

Period Start	Period End	FLSA Min. Wage Rate	Hours Worked	Wages Owed
10/7/24	10/20/24	\$7.25	100	\$725.00
10/21/24	11/3/24		100	\$725.00
11/4/24	11/17/24		84	\$609.00

- c. I am owed **\$1,900.00** in unpaid overtime wages, calculated below:

Period Start	Period End	Hourly Rate	Overtime Rate	Overtime Worked	Wages Owed
4/22/24	5/5/24	\$12.00	\$6.00	10	\$60.00
5/6/24	5/19/24	\$12.00	\$6.00	20	\$120.00
5/20/24	6/2/24	\$12.00	\$6.00	20	\$120.00
6/3/24	6/16/24	\$12.00	\$6.00	20	\$120.00
6/17/24	6/30/24	\$12.00	\$6.00	20	\$120.00
7/1/24	7/14/24	\$12.00	\$6.00	20	\$120.00
7/15/24	7/28/24	\$12.00	\$6.00	20	\$120.00
7/29/24	8/11/24	\$16.00	\$8.00	20	\$160.00
8/12/24	8/25/24	\$16.00	\$8.00	20	\$160.00
8/26/24	9/8/24	\$16.00	\$8.00	20	\$160.00
9/9/24	9/22/24	\$16.00	\$8.00	20	\$160.00

- d. Totals:

FLSA: \$2,059.00 (mw) + \$1,900.00 (ot) = \$3,959.00

Fla. Law: \$4,544.00

Grand Total: \$4,544.00 + \$1,900.00 = \$6,444.00

4. I am also seeking liquidated damages in the amount of **\$3,959.00**, which is the same amount of my unpaid minimum wages and overtime pay owed under the FLSA.

5. In total, I am owed **\$10,403.00** in unpaid wages and liquidated damages, in addition to entitlement to recovery of my attorneys' fees, costs, and reasonable expenses.

DECLARATION

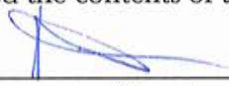
By my signature below, I execute this declaration in Miami-Dade County, Florida, and declare under penalty of perjury that the foregoing is true and correct.


Dated 17/11/2025


CARLOS MANUEL VASQUEZ LOPEZ

INTERPRETORS ACKNOWLEDGEMENT

On November 17, 2025, Katelyn Schickman, personally known to me, affirmed that the foregoing was translated for Carlos Manuel Vasquez Lopez, and that he fully understood the and affirmed the contents of the foregoing.

By: 
Interpreter Signature


Notary Public Signature

Signature: 
Carlos Manuel Vasquez Lopez

Email: Carlosvasquezaz617@gmail.com

Stamped:

